

1 Robert Roos
 2 Arizona Bar No. 009915
 3 Andrew Jacobsohn
 4 Arizona Bar No. 037792
WOMBLE BOND DICKINSON (US) LLP
 5 201 East Washington Street, Suite 1200
 6 Phoenix, AZ 85004
 7 Tel: 602.262.5311
 8 Email: Robert.Roos@wbd-us.com
 9 (Admitted pro hac vice)
 10 Email: Andrew.Jacobsohn@wbd-us.com
 11 (Admitted pro hac vice)

12 Dale Kotchka-Alanes
 13 Nevada Bar No. 13168
WOMBLE BOND DICKINSON (US) LLP
 14 3993 Howard Hughes Pkwy, Suite 600
 15 Las Vegas, NV 89169-5996
 16 Tel: (702) 949-8200
 17 Email: Dale.Kotchka-Alanes@wbd-us.com

18 *Attorneys for Defendants JE Dunn Construction
 19 Company, Federal Insurance Company, Hartford
 20 Fire Insurance Company, Travelers Casualty and
 21 Surety Company of America, Pacific Indemnity
 22 Company*

23 **UNITED STATES DISTRICT COURT
 24 DISTRICT OF NEVADA**

25 UNITED STATES OF AMERICA, for the use and
 26 benefit of SUSTAINABLE MODULAR
 27 MANAGEMENT, INC., a Texas corporation,

28 Plaintiff/Counter-Defendant,

vs.

29 J.E. DUNN CONSTRUCTION
 30 COMPANY; FEDERAL INSURANCE
 31 COMPANY; HARTFORD FIRE INSURANCE
 32 COMPANY; TRAVELERS CASUALTY AND
 33 SURETY COMPANY OF AMERICA; DOE
 34 Individuals I-X and ROE Entities I-X, inclusive,

35 Defendants/Counter-Claimants.

36 Case No. 2:20-cv-00790- GMN-NJK

37 **JOINT STATUS REPORT AND
 38 STIPULATION FOR EXTENSION OF
 39 TIME REGARDING SETTLEMENT**

40 **(FIRST REQUEST FOR EXTENSION)**

41 Pursuant to the Court's June 2, 2025, Minute Entry Order (ECF No.174), the Parties
 42 submit this Joint Status Report.



1 The parties finalized and approved the settlement agreement for this matter and are
 2 currently circulating the final agreement for signatures by all parties. Due to the number of
 3 signatories to the agreement and the upcoming holiday, the parties anticipate that they will require
 4 through July 11, 2025, to obtain all signatures and file a stipulation for dismissal with prejudice.

5 Accordingly, the parties request that the Court provide the parties through July 11, 2025,
 6 to file dismissal documents or to update the Court on the status of settlement. This is the first
 7 request for an extension of time regarding settlement. The parties do not anticipate requesting a
 8 further extension.

9 DATED July 2, 2025.

10 HARTWELL THALACKER, LTD

11 By: /s/ Michael S. Alfred

12 Doreen Spears Hartwell, SBN 7525
 13 Laura J. Thalacker, SBN 5252
 14 11920 Southern Highlands Pkwy, 201
 15 Las Vegas, Nevada 89141

16 VerisLaw, PLLC
 17 Michael S. Alfred
 18 (admitted *pro hac vice*)
 19 4843 Colleyville Blvd.,
 20 Suite 251-391
 21 Colleyville, Texas 76034

22 *Attorneys for Plaintiff*

12 WOMBLE BOND DICKINSON (US) LLP

13 By: /s/ Robert F. Roos

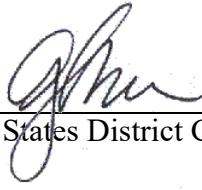
14 Robert F. Roos (Pro Hac Vice)
 15 Andrew Jacobsohn (Pro Hac Vice)
 16 201 East Washington Street, Suite 1200
 17 Phoenix, Arizona 85004-2595

18 Dale Kotchka-Alanes, Bar No. 13168
 19 3993 Howard Hughes Pkwy, Suite 600
 20 Las Vegas, NV 89169-5996

21 *Attorneys for Defendant/Counterclaimant
 22 JE Dunn Construction Company and Surety
 23 Defendants*

24 **ORDER**

25 **IT IS SO ORDERED**

26 
 27 _____
 28 United States District Court Judge



1 **CERTIFICATE OF SERVICE**
2

3 Pursuant to Fed. R. Civ. P. 5(b) and Section IV of District of Nevada Electronic Filing
4 Procedures, I certify that on July 2, 2025, that the above JOINT STATUS REPORT AND
5 STIPULATION FOR EXTENSION OF TIME REGARDING SETTLEMENT (FIRST
6 REQUEST FOR EXTENSION) was served via electronic service on all counsel of record.

7
8 */s/ Luz Horvath*
9 Of Womble Bond Dickinson (US) LLP

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201 East Washington Street, Suite 1200
Phoenix, AZ 85004

WOMBLE BOND DICKINSON

